REMARKS

Claims 1-4, 6-10, and newly added claims 18-22 are all the claims pending in the application. Claims 5 and 11-17 are canceled herein without prejudice or disclaimer. Claims 1-2, 4 and 8 stand rejected upon informalities. Claims 1-10 stand rejected on prior art grounds. In addition, the drawings and specification are objected to. Applicants respectfully traverse these objections/rejections based on the following discussion.

I. The Objections to the Drawings

The drawings are objected to because, according to the Office Action, they fail to show the substrate 10, because the figures are improperly cross-hatched, and because Figures 3 and 4 are not sufficiently clear. A proposed drawing correction is provided herewith with changes made in red. Should the Examiner find the proposed drawings acceptable, new formal drawings will be submitted upon the indication of allowance of the application.

The Office Action indicates that the drawings as originally submitted on August 31, 2001 are being objected to. However, the Applicants have subsequently submitted new formal drawings (received by the USPTO on November 4, 2002), wherein a copy of the return acknowledgment postcard is included herein as proof of submission. Therefore, the proposed drawing corrections are being made to the later-filed drawings (11/4/02 drawings).

Specifically, Figures 1-6 are amended to include the substrate. Additionally, Figures 7-9 are amended to more accurately label the various elements. Moreover, it is

unclear to the Applicants exactly which drawings are being objected to because of improper cross-hatching. In fact, it is unclear what is meant in the Office Action by: "All of the parts shown in section, and only those parts, must be cross hatched." It is the Applicants' position that the drawings submitted on 11/4/02 are properly hatched.

Moreover, it is unclear why the Office Action indicates that Figures 3 and 4 are unclear "and difficult to read as reference numeral 81, marked in both the figures..." In fact, there is no reference to element 81 anywhere in Figures 3 or 4. However, again it is the Applicants' position that the drawings submitted on 11/4/02 are clear and not difficult to read.

In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw this objection.

II. The Objections to the Specification

The specification is objected to because of informalities. As such, paragraphs [0029] and [0031] through [0033] are amended herein to remove the offending language cited in the Office Action. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw this objection.

III. The 35 U.S.C. §112, Second Paragraph Rejections

Claims 1-2, 4 and 8 stand rejected under 35 U.S.C. §112, second paragraph. Applicants respectfully traverse these rejections based on the following discussion. Independent claims 1 and 8 and dependent claim 4 are amended herein to more particularly point out and distinctly claim the subject matter which the Applicants regard

as their invention. With respect to the rejections of claims 2 and 8 and the claimed language, "a plurality of electrical connections," in fact, these features are shown in Figures 8 and 9 as originally filed, and indicated as elements reference numerals 100, 110, 120, and 130. Moreover, the specification refers to these features in paragraph [0033]. Claim 4 is amended to include the distinction that the first and second conductive materials are electrically conductive. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw these rejections.

IV. The Prior Art Rejections

Claims 1-5, 7-8 and 10 stand rejected under 35 U.S.C. §102(b) as being anticipated by Goenka (U.S. Patent No. 6,111,204). Claims 6 and 9 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Goenka as applied to claims 1-3, 5, 7, and 10 and further in view of Tanamura et al. (U.S. Patent No. 6,306,559), hereinafter "Tanamura". Applicants respectfully traverse these rejections based on the following discussion.

Goenka teaches an etched tri-metal-layer air bridge circuit board specially designed for fine-pitch applications, comprising: an electrically insulative substrate surface, a plurality of tri-metal-layer bond pads arranged in a generally straight row on the substrate surface wherein the row defines a width direction therealong, and a circuit trace arranged on the substrate surface, wherein the circuit trace runs between two adjacent ones of the plurality of tri-metal-layer bond pads. Each bond pad comprises: (1) a bottom layer attached to the substrate surface, the bottom layer being made of a first metal and having an overall width W1 as measured along the width direction; (2) a top

layer disposed above and generally concentric with the bottom layer, the top layer being made of the first metal and having an overall width W2 as measured along the width direction; and (3) a middle layer made of a second metal connecting the bottom layer and the top layer. The bond pads are specially shaped such that W2>W1 for at least the two adjacent bond pads, thus enabling the circuit trace to be spaced closely to the bottom layers of the two adjacent bond pads, while allowing the top layers of the pads to be made much larger so as to avoid delamination thereof from their associated middle layers.

Tanamura teaches an organic electroluminescent device having a deposition-preventing layer formed with accuracy therein to have a predetermined profile. The deposition-preventing layer facilitates sure microfabrication in producing the device. The radiative recombination probability in the non-selected area of the organic luminescent layer in the device is greatly reduced. The device has a substrate, a first electrode layer overlying the substrate, a first deposition-preventing layer partly overlying the first electrode layer and forming at least a portion of boundaries of an active area of the electroluminescent device and an organic luminescent layer and a second electrode layer formed in that order overlying the first electrode layer within the active area. To form the deposition-preventing layer, used is a photosensitive resin composition which comprises: i) a polymerizable compound; and ii) a photoinitiator having an initiation wavelength λ, wherein the photosensitive resin composition has a reduced transmission of light of wavelength λ.

However, the amended claimed invention provides features not taught or suggested by either Goenka or Tanamura, whether taken alone or in combination. Specifically Goenka and Tanamura as well as all of the prior art of record do not teach or

suggest, "[a]n electrode device comprising a plurality of electrode fingers, wherein each electrode finger comprises: a substrate; a first electrode adjacent to said substrate, wherein said first electrode comprises an upper region and a lower region, wherein said upper region is wider than said lower region; and a second electrode disposed on top of said upper region of said first electrode and in a region in between each of said electrode fingers," as defined in independent claim 1 and defined in part in independent claim 8.

In fact, Goenka discloses a tri-bond pad structure. Assuming that the bond pad structure of Goenka is analogous to an electrode, clearly Goenka discloses three bond-pads (a first layer 18, a middle layer 16, and a bottom layer 14). Whereas the claimed invention clearly only requires two electrodes (first electrode and second electrode). Thus, a fundamental element of Goenka (the bottom layer 14) is missing from the claimed invention. Therefore, the claimed invention is patentably distinct over Goenka.

Similarly, Tanamura discloses a similar tri-layered structure comprising a first deposition layer 3b, an organic layer 4, and an electroconductive layer 5. Again, the claimed invention clearly only requires two electrodes (first electrode and second electrode). Moreover, the tri-layered structure in Tanamura is clearly not formed adjacent to the substrate 1. Therefore, the claimed invention is patentably distinct over Tanamura.

Moreover, even if Goenka and Tanamura were legally combinable, and there is no indication as to a motivation for such a combination, then they would still fail to disclose the elements of the claimed invention for the reasons provided above. Thus, neither Goenka nor Tanamura, whether taken alone, or in combination with one another teaches the claimed invention. Therefore, the Examiner is respectfully requested to reconsider

and withdraw these rejections.

V. Formal Matters and Conclusion

With respect to the objections/rejections to the specifications and claims, the specification and claims have been amended, above, to overcome these objections/rejections. With respect to the objection to the drawings, a Submission of Proposed Drawing Corrections is submitted herewith. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw the objections to the specification, claims and drawings.

Therefore, Applicants respectfully submit that amended independent claims 1 and 8 are patentable over the prior art of record. Furthermore, dependent claims 2-4, 6-7, 9-10 are similarly patentable, not only by virtue of their dependency from a patentable independent claim, but also by virtue of the additional features of the invention they define. In view of the foregoing, Applicants submit that claims 1-4, 6-10, and newly added claims 18-22, all the claims presently pending in the application, are patentably distinct from the prior art of record and are in condition for allowance. Moreover, no new matter is being added. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary.

Please charge any deficiencies and credit any overpayments to Attorney's Deposit Account Number 50-0510.

Respectfully submitted,

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